

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

PCCare247 Inc., a corporation,

PC Care247 Solutions Private Limited, a
corporation,

Connexxions Infotech Inc., a corporation,

Connexxions IT Services Private Limited, also
d/b/a Connexxions InfoTech Services Pvt. Ltd., a
corporation,

Vikas Agrawal a/k/a Vikas Agarwal, individually
and as an officer of PCCare247 Inc., PC Care247
Solutions Private Limited, and Connexxions IT
Services Private Limited,

Navin Pasari, individually and as an officer of
PCCare247 Inc.,

Anuj Agrawal, individually and as an officer of
PCCare247 Inc., Connexxions IT Services Private
Limited, and PC Care247 Solutions Private
Limited,

Sanjay Agarwalla, individually and as an officer
of Connexxions Infotech Inc., and

Parmeshwar Agrawal, individually and as an
officer of PC Care247 Solutions Private Limited,

Defendants.

**PLAINTIFF FEDERAL TRADE COMMISSION'S MOTION FOR AN *EX PARTE*
TEMPORARY RESTRAINING ORDER WITH ASSET FREEZE AND OTHER
EQUITABLE RELIEF, AND ORDER TO SHOW CAUSE WHY A
PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

Plaintiff, Federal Trade Commission (“FTC”), having filed a Complaint for Injunctive and Other Equitable Relief pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b), hereby moves on an *ex parte* basis, pursuant to Fed. R. Civ. P. 65(b), for an *Ex Parte* Temporary Restraining Order with Asset Freeze and other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue (“TRO”) against Defendants PCCare247 Inc., PC Care247 Solutions Private Limited, Connexions Infotech Inc., Connexions IT Services Private Limited, Vikas Agrawal, Navin Pasari, Anuj Agrawal, Sanjay Agarwalla, and Parmeshwar Agrawal (“Defendants”). As described in greater detail in the FTC’s supporting Memorandum of Law, Defendants violate Section 5 of the FTC Act by misrepresenting that they are affiliated with a legitimate computer company, and falsely claiming that they have detected the presence of security or performance issues in the consumers’ computers, including viruses, spyware, or system errors. Defendants make these misrepresentations in order to scare consumers into purchasing unnecessary computer repair services.

In the interest of immediately protecting consumers and preventing the dissipation of assets, the Commission seeks a TRO, which would temporarily, inter alia: (1) enjoin the Defendants from making misrepresentations to consumers; (2) direct webhosting companies to disable Defendants’ websites; (3) freeze Defendants’ assets; (4) require Defendants to provide a financial accounting; (5) require Defendants to repatriate foreign assets; and (6) require Defendants to preserve documents and turn over business records to the FTC. Such an order is necessary to stop the Defendants’ unlawful conduct and prevent the dissipation of assets and destruction of records, thereby preserving the Court’s ability to provide effective relief to consumers nationwide victimized by the Defendants’ deceptive practices.

The interests of justice require that this Motion be heard without notice, pursuant to Fed. R. Civ. P. 65(b). As explained more fully in the FTC's TRO Memo and Declaration of Counsel Pursuant to Rule 65(b), advance notice of this action would likely cause Defendants to dissipate assets or destroy documents. Such actions would cause immediate and irreparable damage to the FTC's efforts to prosecute this case, and to preserve assets for effective final relief. For these reasons, the FTC has not provided notice of this Motion to the Defendants.

DATED: September 24, 2012

Respectfully submitted,

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General Counsel

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